

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

~~Department of Corrections, Superintendent of Prisons~~

~~Department of~~ Khalif Abdullah

Write the full name of each plaintiff.

No. _____
(To be filled out by Clerk's Office)

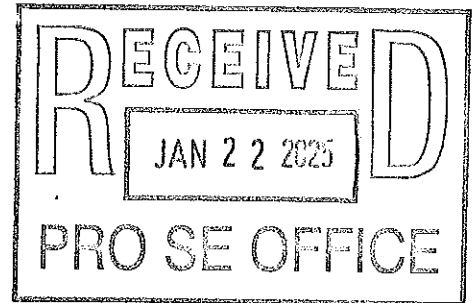
COMPLAINT
(Prisoner)

Do you want a jury trial?
☒ Yes ☐ No

-against-

~~Department of~~ Department of
Corrections, J. Wilcox, Sgt S. Leon

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other: _____

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

Khalif TARIQ Abdullah
First Name Middle Initial Last Name

N/A
State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

349-270-1626 RIKERS Island ATTORNEY 14A2966
Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

RIKERS Island
Current Place of Detention

1600 Hazen ST
Institutional Address

EAST Elmhurst
County, City

NY
State

11370
Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☐ Convicted and sentenced prisoner

☐ Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:

Department of Correction
 First Name Last Name Shield #
Employees
 Current Job Title (or other identifying information)

1220 Washington
 Current Work Address
Albany Ny 12220
 County, City State Zip Code

Defendant 2:

Sgt S. Leon
 First Name Last Name Shield #
Sergeant
 Current Job Title (or other identifying information)

Attica Correctional Facility
 Current Work Address
Attica Ny 10064
 County, City State Zip Code

Defendant 3:

Super Intendent J. wilcox
 First Name Last Name Shield #
Sup. Intendent at Attica Correctional Facility
 Current Job Title (or other identifying information)

Attica Correctional Facility
 Current Work Address
Attica Ny 10064
 County, City State Zip Code

Defendant 4:

First Name Last Name Shield #
 Current Job Title (or other identifying information)

Current Work Address
 County, City State Zip Code

V. STATEMENT OF CLAIM

Place(s) of occurrence: Attica Correctional facilityDate(s) of occurrence: July 24, 2023

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

^{doing 11 YEARS}
 While I was in Attica Correctional facility I wrote J Wilcox
 The Super intendent At The Time A letter containing Personal information
 Requesting to move off my Block (D) so that i may go home in peace
 which was set for Sep. 28. 2023. I had "no" Enemies nor
 Did i Ever state in The letter That i had Enemies. The Sup int
 Sent The letter to Sgt S leon who ~~then~~ ^{was} became mad At me for mistakenly
 Pronouncen her name "leona" in A letter written to The facility
 Requesting to move ^{Prior} ON July 24 At 11:00 o'clock while i was
 using The kiosk, i Seen Sgt leon Walking with A member of The "bloods" into
 her office with my letter (I saw my hand written). upon exiting The
 Room She look Directly At me And said "hes Switching Right"?
 An The inmate said Yes. (All of This is well documented on "camera")
 In GreivanceS, letters to OSI, FBI, The Commissioner, The Governor
 Albany (1220 Washington), P.C Reports, Special investigation unit, and
 Many other Agencies i wrote while in Attica. After That i had A
 Bunch of Enemies, I was LABELD A Rat ~ made A Blood "hit"
 And was marked for death inside Prison And outside Prison by gangs.
 THE STATE Officer And Employees you Encounter have The Same Duty not to
 harm you And your Property That other Citizen have, and because
 They are State ACTORS They also have A Duty not to Violate your

Federal and Constitutional Rights. The Defendant^s used cruel and unusual Punishment To Abuse me And violated my Constitutional protections. After being labeled A "Rat" An Place on multiple Gang "Hit List" by gang hierarchy 2 Attempts, 2 Seperate Time was made on my Life At Attica forcen me To Sign into P.C Two Times JUST SO I would not catch a Ticket (by fighting) An REVIN my Chances To go home. I was so "humiliated" - The whole Jail was Tryng To Kill me And The torture continue on The P.C Block AS bullies would constantly "Yell" Rat, Snitch, ~~and~~ while on 24 lockdown in the Protective unit.

INJURIES: continued on (p. 2) -----

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

i was diagnosed with PTSD where i have To Take buspirone, clonidine, paroxetine, (Mental Anxist), "Defamation" - i was table A "Snitch" ~~here~~ And A Rat because of the defendant^s action, "incarceration," because of the defendant action - i was "bullied" leading TO A Alleghe incident with a gang member causing ^{my} arrest. because of defendant^s action i am being jump "now" in every gang house I've been in on Riker Island, i've been stabbed in the head leaving A 1 cm laceration To the head Needing Recommended Staple^s and Stitches. I Receive Damage To my VI. RELIEF Eye Needing Stronger Glasses.

State briefly what money damages or other relief you want the court to order.

i want the Relief of ~~225~~ 225 million\$ Paid in full by Defendant^s
I want Sgt Leon "fired" for her Role in damaging my Life
I want Sup intendent Jo Wilcox fired for her Role
in Damaging my Life An The Department of correction thoroughly
Investigated for Allowing Staff MalfeSance againt
Residence During There watch (Attica)

continued pg 2

This was also Placed on The Record As i Constantly wrote Grievances, State agencies The FBI, OSI, SIV, Albany, The Commissioner, The governor, The Sup int And many other agencies I wrote while AT ATTICA. Sep 28th 2023 I was Released on Parole from ATTICA Correctional facility. Once i was out i Thought The Danger was "Over" but i Was Release INTO The NYC Department of homeless Services. An once There I would be met with brutal Torture And harrasment from The minions of The old gang hierarchy incountrd Upstate (AT ATTICA). Due TO The Defendant's ACTIONS i Accumulated These Enemies which put me AT A higher Risk of Reoffending. I Tried To ignore it Because i Knew I was on Parole ^{AS} A "Violent felon" but The Suffering mental Anguish incountrd while in These ~~Shelters~~ Shelters was So overwhelming i Just wanted to Commit Suicide. Because OF The defendant ACTIONS I was bullied, haze, called A Rat, ~~"faggot"~~, I had NO friend An Was always under The Scope of my "Enemies", it was Torture And many days I felt Like Exploding while This was ^{happening} ~~taken place~~ to me i made Sure i Stayed Programming, gaining Certification in Trades, working in Internships

And Complying with Paroll so much that i was set to be Released in 2 1/2 Years
on A 5 Year Supervision. I was now And then Reformed And Working towards building my life.
I obtained my Subsidy voucher ~~and~~ was looking for housing to move out of the shelter.
I Got my permit to Drive And was working Towards obtaining my ~~GED~~ - i also was
Attending work Help for Programing And ^{was} soon to be Employed as a Certified Constodial
maintenance technician, But Every night i would Return back to the shelter And would Be
met with the most furvousous bullying And harrassment that it began to overwhelm me
Mentally". I moved to "4" Shelters during my 7 month's free. The last shelter I was in
was Ward's island, This shelter was no different then Attica. I was harrassed
mentally ~~tortured~~ Tortured And Abused, I was called a "Snitch", A ^{Rat} ~~bag~~, my bed space
was Violated. I was threatend with "Violence" I Notified Staff, Particulary
my Counselor M.S Cruz - i Told her the gangs Hide in numbers so its hard to pin point them.
She Told me they could NOT Move me untill something Physically happens to me.
Since i could NOT JUST Pack my stuff And "leave" (Cause I was on Paroll) I was
Just "Stuck" To Endure the tortur And bullying.

~~REAPPEARED~~

I became overwhelmed Emotionally which lead To a "Alleged" Altercation with a gang member 4-25-2024. upon my arrest I was Placed in a cell for countless hours, I was Then Place on Rikers Island where i am Being Abuse ~~by~~ verbally harrassed, "isolated" And bullied in every gang house in IN. I was Jumped Nomourous times by "SRG" Gang members, STABBED in my head And loss Some of my sight in the "Right Eye" which i now need "Stranger" Glasses. i Spent 9 months incarcerated up untill This Date 1/10/25 And I am Requesting 225 million \$ in Damage^s that Stemmed from the defendant^s Violation of my Constitution Right ~~to be free~~

On ~~July 1995~~ I wrote Sup Int A letter Requesting to move blocks And Acting in Concert with the Sgt ^{she} Took the letter And Attempted to get me killed.

On ~~July 2015~~ Sgt Leon Took a letter and Show it to gang members got me "PUT OUT there" on "hit List" ~ Labeled a Rat ^{IN A} Attempt to get me Killed by gang members And its all on "Record" (Including camera)

This was Cruel and unusal Punishment inflicted And A Violation of my Constitutional Rights - "The State Employees violated There duty not to harm me" ~~to be free~~

The Depart ment of Correction are Responsible for hiren These "dirty Employees" Making Them Responsible AS well. Brutal Tatic^s Are Being use by State Employee To Abuse us AS witness ^{place} by the murder ~~taken~~ on camera in mercy C.f, my Claim is true And can be proven! Khalid Asad ~~Asad~~

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>Jun, 10th 2025</u>		<u>Khalif Abdullah</u>
Dated		Plaintiff's Signature
<u>Khalif</u>	<u>TARIQ</u>	<u>ABdullah</u>
First Name	Middle Initial	Last Name
<u>1600 hazen st</u>		
Prison Address		
<u>East Elmhurst</u>	<u>NY</u>	<u>11370</u>
County, City	State	Zip Code

Date on which I am delivering this complaint to prison authorities for mailing: 4/11/25

Khali F. Abdurrahman
349 2401 26
1600 Hawthorne St
East Elmhurst, NY 11370

FCM LETTER
ASTORIA, NY 11103
JAN 15, 2025



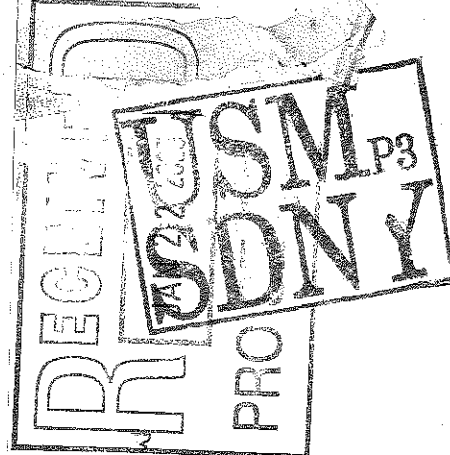
10007



\$8.50

S2324M503689-08

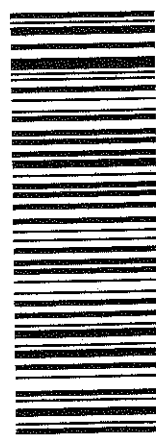
RDC 99



PRO SE INTAKE window
LOCATION
500 PEARL STREET
NEW YORK NY 10007

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD ON DOTTED LINE

CERTIFIED MAIL



7022 2410 0003 0116 3105